

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**RESPONSES OF UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKER UNION, AFL-CIO INTERROGATORIES
REDIRECTED FROM WITNESS JEFFREY C. DAY
(APWU/USPS-T1-4)**

The United States Postal Service today files the responses to the above-identified interrogatory of the American Postal Worker Union, AFL-CIO (APWU), dated June 22, 2012. The interrogatory has been redirected from witness Day to the Postal Service for institutional response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie
Adriene M. Davis
James M. Mecone

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5402
June 29, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
APWU INTERROGATORY REDIRECTED FROM WITNESS DAY**

APWU/USPS-T1-4.

Your testimony indicates that the type of community served by a Post Office is not considered in the POSStPlan analysis [Page 15-16]. Why has the Postal Service decided not to consider this information?

- (a) Do you believe there is no value to considering the type of community served by a Post Office?
- (b) Do you believe that all communities have the same need for postal services?
- (c) Do you believe that all types of communities have the same means to provide input to the Postal Service?

RESPONSE

- (a) For the purposes of POSStPlan, the important issue is a community's need for postal services, as evidenced by a community's use of postal services, rather than the type of community. The Postal Service determined that consideration of the three criteria identified on page 15 of the Direct Testimony of Jeffrey C. Day on Behalf of the Postal Service (USPS-T-1), "the AEWL of a Post Office, the distribution of RMPOs (clusters), and the distance between Post Offices," was the most effective way to achieve the goals of POSStPlan, tailoring the Postal Service retail network to actual customer use of postal services, using AEWL as a proxy for customer use.
- (b) No, communities have different needs for postal services. A community's need for postal services is demonstrated by its use of postal services, which is reflected in the measurement of adjusted earned workload.
- (c) A means for providing input to the Postal Service is available to customers in all communities served by the Postal Service.